



A Comparative Study on the Opportunities and Threats of the Internet and Considering the Rights of Kids Online in Australia, Brazil, Iran, and South Africa

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ARTICLE INFO	ABSTRACT
<p>Received: 31 July 2021 Revised: 27 August 2021 Accepted: 06 October 2021 Online: 30 November 2021</p>	<p>The present study aims to compare the opportunities and threats of the Internet and considering the rights of kids online in Australia, Brazil, Iran, and South Africa. The research method was qualitative-comparative using Bereday's approach. The strategy for selection of countries was "different systems, different outputs". The population included 210 studies from which 45 samples related to research objectives were selected. Primary documents and self-assessment method were used for increasing the validity and reliability of references, respectively. John Stuart Mill's agreement and difference method was used for data analysis and George Bereday's method was used for presenting the results. The findings indicated that most similarities are in Internet threats and most differences are in the opportunities created for kids online and considering their rights in these countries. Cyber-bullying and Internet addiction threaten all kids online in such countries. In terms of considering the rights of kids online, Australia is at the top of the list, followed by Brazil, South Africa, and Iran. No serious measure has been taken in Iran to ensure the rights of kids online due to weak infrastructure, low internet speed, and legal gap. Based on the findings, cyberspace authorities and planners in Iran are suggested to take more legal, executive, and educational measures in the framework of international cooperation to achieve the rights and welfare of kids online.</p>
<p>KEYWORDS</p> <p>Comparative Research Internet Opportunities Rights of Kids Threats</p>	

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1. Introduction

The Internet is the platform of communications in the digital world which connects the world together. This technology has created a global network by eliminating temporal and spatial boundaries through connecting millions of people simultaneously. Nowadays, the Internet use by children and adolescents has become increasingly global (ITU, 2013 as cited in Livingstone, 2016). An increase in the Internet access leads to an increase in the opportunities and threats caused by the experiences of kids online. Considering the welfare and rights of kids and adolescents online (9-17years old) in the present era is one of the primary consequences related to the opportunities and threats affecting Internet users. Experimental findings indicated that more online opportunities are always associated with more online threats and vice versa (Livingstone & Helsper, 2010).

Extensive studies have been conducted in most countries of the world on the positive and negative effects of Internet use and its effect on the rights and welfare of children and adolescents, providing appropriate solutions for the optimal use of cyberspace to achieve their rights (Kalmas et al., 2016). The Convention on the Rights of the Child (CRC, 1989) determined some basic non-discriminatory standards for all children around the world. This convention explicitly emphasizes human rights about the freedom of individual and collective expression of children, including the right to grow and play, as well as the right to support and care necessary for their welfare (Livingstone, 2016). Article 19 of the Convention obliges governments to take appropriate legal, administrative, social and educational measures for protecting children from all forms of physical or psychological violence, assault, abuse, negligence, or exploitation (Husseini, 2019, Alderson, 2000). This convention considers children's rights as the right of provision, protection, and participation. Provision right includes the appropriate provision and distribution of resources and services for children to have easy access to cyberspace. Provision rights include infrastructure, computer facilities and equipment, high speed, and bandwidth. Protection right means the protection of children against all forms of abuse, exploitation, sexual harassment, and harassment that they face while using cyberspace. The participation right of kids online includes all of the subjects affected by the cyberspace. Creating conditions to communicate through social media, creating opportunities for advice on how to manage and control cyberspace, creating conditions for children to be heard, and creating some conditions to connect with peers in cyberspace are among the examples of participation right.

Online studies for kids emphasize a child-centered approach (Christensen & James, 2008). This approach considers children's experiences and conditions, as well as consequences and what they can achieve through a direct search on the Internet. Children can use the Internet in different ways and roles such as receiving, participating, and acting. Determining the role of children in these three cases is not always easy since recognizing each of these roles depends on the actions of individuals, institutions, peer groups, and adults. In this regard, the Global Kids Online Project (GKO) is one of the most extensive studies. This project is being conducted in cooperation with UNICEF to protect the rights of children while using the Internet, reduce its negative effects, and increase its positive effects. This project aims at collecting evidence about vulnerable kids online and acts in a flexible way with an emphasis on the cultural and social characteristics of countries.

This study identified the opportunities and threats and considering the rights of kids online to provide valuable information from the experiences of kids online with different backgrounds and cultural sensitivities for researchers and professionals around the world (Livingstone, 2016). Boer et al. (2020) conducted a study in 29 countries and found that the youth with more problems using the Internet have lower levels of welfare. However, using the Internet can help kids online in some areas of welfare in many countries where the widespread use of social media has become a norm (Sozio et al. 2015). In a comparative-analytical study in Brazil and seven European countries as part of the project on kids online, Brazilian children are often connected to the Internet via mobile phones instead of laptops and tablets, indicating the stability of the socio-economic gaps of Brazilian online children compared to European countries. Based on the global internet statistics, Iran, with a population of about 84 million people, had about 68 million users at a penetration rate of 80.5% by the end of June 2020 (Internet World Stats, 2021). According to the 2016 census, more than half of the population in Iran is under 35 years old, about 30.8% are in the age group 0-19 years (Statistics Center of Iran, 2019). The statistics indicated that most Internet users are the children and adolescents exposed to its positive and negative effects and require more protection and care. Several studies have been conducted in Iran on the positive and negative effects of the Internet (e.g. Dadras, 2019; Mohebzadeh, 2020, Pournaghdi, 2018; Roknabadi, 2016; Zare, Alimoradi & Rahmanian, 2020) while no study has been performed on considering the rights of kids online. Accordingly, finding the experiences of other countries regarding the opportunities and threats of the Internet and considering the rights of kids online is considered as the concern of current researchers.

The results of this study can provide a clearer perspective for cyberspace planners, teachers, advocates, and policymakers to take fundamental steps for protecting the rights and welfare of children by increasing opportunities and reducing threats. Accordingly, the present study aimed to compare the opportunities and threats of the Internet and considering the rights of kids online in Iran with Australia, South Africa, and Brazil. To achieve the main objective of the study, the following special questions are raised:

- What are the opportunities, threats, and rights of kids online in the selected countries?
- What are the similarities and differences between different dimensions of opportunities, threats, and rights of kids online in the selected countries?
- What are the proposed solutions to reduce threats and increase opportunities for achieving the rights of Iranian kids online?

2. Review of Literature

The Internet appeared in the US during the 1970s but was not available to the public until the 1990s. With the advent of smartphones such as Apple, the number of Internet users throughout the world increased rapidly until half of the world's population currently has access to the Internet (Global Internet Statistics, 2021). With the advent and expansion of the Internet, some concerns have been raised about its positive and negative effects on kids online, emotionally, cognitively and behaviorally and how their rights are being addressed throughout the world. On the 25th anniversary of the Convention on the Rights of the Child, the UNICEF advocated the research strategies for a global program for the rights of children aged 9-17 years. Late childhood and adolescence is a critical time of social and emotional development which can jeopardize the welfare of cyberspace users based on the studies Livingstone and Bolger (2013), as well as the International Symposium on Global Research on the Rights of the Child in Digital Age (Sozio et al., 2010). This period of children's lives has been mainly affected by the Internet as a source of information, interaction and entertainment for the past two decades. Findings indicated that the use of the Internet is negatively associated with some areas of children's lives, the strongest effect of which is related to children's feelings about their appearance, which is higher in girls than in boys. In addition, children spend less time on other rewarding activities by using the Internet (McDool, et al. 2019).

It is clear that digital technology has brought many potential benefits for children such as communication with peers, access to educational resources, and different learning games and entertainment. At the same time, there are some concerns about who kids online communicate with. Concerns about whether children experience cyber-bullying or the texts according to their ages or how much media communications may harm their social development and welfare (Kadefl-Winther, 2017; Swist, Collin, & McCormack, 2015) in the Australian Online Children's Research Report concluded that the Internet use can be beneficial and effective for children provided that they are trained to use the Internet appropriately and increase resilience against cyber threats. Sampasa - Kaninga, & Hamilton, 2015) in a study entitled "Using social networking websites and the threat of cyber-bullying among the students aged 11-20 years in Canada" found that 19% of adolescents had been cyber-bullied during the past 12 months. The results of this study highlight the need for awareness and education of adolescents in effective strategies to prevent cyber-bullying. Cyber-bullying can begin negative effects on users in committing suicide (Koehler & Parrel, 2020). Turkle (2012, as cited in Kadefl-Winther 2017) stated that children are more connected to each other via their phones, making them miss many important social experiences. In this regard, the digital world has created new challenges for parents, facing them with the important problem of balancing independence and exploration of their children, as well as creating restrictions (Anderson, 2016, as cited in Kadefl-Winther, 2017). D Worac et al. (2007 as cited in Kadefl-Winther, 2017), suggested that video games may disrupt children's sleep patterns. In support of such concerns, researchers have introduced different areas in which digital technology has had a negative effect on children's welfare during the past two decades. Such areas include mental health problems such as depression, Internet addiction, and general health issues such as obesity.

The studies by Livingston et al. (2011) indicated that digital technology has many benefits for children . Since such concerns are not new phenomena and have existed in the past in other media, it is significant to conduct critical studies to evaluate the validity of these concerns in the Internet use. Another problem is that the information provided on the Internet is not often studied and every person can be a writer on the Internet. Therefore, the Internet may contain inaccurate, biased, and misleading information for users. Despite the approval of the Internet content by many people (UCLA research, 2001), children as Internet users are the most native victims of misinformation since they are in the developmental stages in terms of reasoning and judgment (Wajszczyk, 2014).

Early studies on the Internet support its negative effect on the welfare of children and adolescents (Kraut et al., 1998). However, recent researchers such as Schuster et al. (2020) considered a positive relationship between the Internet use and social factors. While online activities increase children's creativity and social skills, there are increasing concerns about its potential negative effects such as Internet addiction, commercial exploitation, and increased risks of exposure to irrelevant concepts (Kuss & Griffith, 2012). A longitudinal study by the World Health Organization for more than 30 years on the health, welfare, social environment, and online behavior of school-age kids online indicated that harmful behaviors such as cyber-bullying are among the most serious harms threatening kids online (World Health Organization, 2013).

Many studies in Iran have mentioned both opportunities and threats caused by cyberspace. Pournaghdi (2018) concluded that threats to discipline and security on social media cause identity crisis, moral anomalies, corruption, immoral relationships, Internet addiction, and reduced academic motivation. Meanwhile, the strengths and opportunities on social media include the expansion of virtual training, development of scientific communications, and E-commerce for users. Roknabadi (2016) regarded academic failure as a negative consequence of social networks and found that only 1.5% of the Internet content is immoral and threatening, while this amount has overshadowed 98.5% of the opportunistic nature of the Internet content. Sayadi et al. (2014) showed a significant positive relationship between the components of students' mental health such as psychological trauma, social control, violence, aggression, lack of concentration, sleep disorders and lying with the Internet use. Ameli & Mohseni Ahoui (2018) in an analytical study on Internet literacy including information and skills in Iran indicated that Internet information literacy is positively associated with Internet skills. In addition, Internet information literacy is related to civic activities.

Forghani and Mohajeri (2018) found a relationship between the components of lifestyle such as changes in clothing, diet, decoration and furniture, shopping style, leisure and entertainment, face-to-face interactions and communications, and the amount of hours spent on mobile social networks, so that the change in each component of lifestyle increases with the increasing hours of using these networks. Emami Rizi (2016) indicated that spending too much time on virtual networks reduces study hours, fatigue of users in the classroom, and their academic achievement. Tahmasbzadeh Sheykhlar & Sadeghpour (2018) showed a relationship between the use of social networks with academic procrastination, students' learning, and self-regulation strategies while the

use of social networks has an indirect effect on students' procrastination mediated by learning strategies and self-regulation. Rouhani & Tari (2012) concluded that social networks do not merely have negative effects but can be used optimally in the educational and treatment process. The factors such as communicating with others, learning social rules, having fun and sharing experiences can be regarded as the most significant reasons for using such networks. Dadras, et al (2019) found a significant inverse correlation between the rate of addiction to mobile social networks and motivation to study among female students. Zare, Alimoradi & Rahmanian (2020) in their research concluded that life skill training reduces users' dependency on cyberspace and cyber-bullying. As observed, the research background indicated that kids online always face with a set of opportunities and threats caused by cyberspace, depending on the economic, social, cultural and political conditions of their countries. The Convention on the Rights of the Children invites member states to plan and comply with the provision of this convention to increase opportunities and reduce threats for the protection of the rights and welfare of kids and adolescents online (Esmaeili, 2010).

3. Research Method

This study was qualitative and comparative in nature which was conducted using George Bereday's approach. This study was a macro research in terms of unit of observation and the strategy of selecting countries was the strategy of different systems, different results. Researchers hypothesized that these countries differ culturally, socially, economically, and politically in terms of children's access to the Internet and the opportunities and threats, as well as considering the rights of kids online. The population included 210 studies during 2000-2021 in the valid scientific databases, from which 45 samples related to the research objectives were selected. The required data were collected by referring to related documents, articles, and studies. Self-assessment was performed by researchers to increase the validity of data from valid and primary documents and increase the reliability of the findings. John Stuart Mill's agreement and similarity method was used to analyze the obtained data and George Bereday's approach was used to present the results.

4. Findings

4.1. Description and interpretation

4.1.1. Australia

With a population of 25.5 million, Australia is the sixth biggest country in the world with a developed economy based on agriculture and trade. This country has emerged as a popular region for the immigrants of the world with a mix of indigenous, British, Chinese, Indian, and other immigrants. Indigenous people with a population of half a million and diverse cultures have not been able to integrate into Australia's multicultural society. There are about 22 million Internet users in this country (Global Internet Statistics, 2021). Almost all Australian children have access to the Internet since the age of 5 and are eager to use social networking services, online games, forums, and instant messaging at a young age. Social media are responsible for social interaction, growth of values and motivations in areas such as physical and mental health, strengthening identity and cultural dependency, creating opportunities for formal and informal learning, civic and political conflicts, as well as filling leisure time for users (Australians Research Alliance for Children & Youth, 2013). Such measures are taken to ensure children's rights increase the health and welfare of Internet users with the least level of risk. Furthermore, online users are taught to increase their resilience while faced with threats so that they can deal with distressing and potentially harmful experiences and actions which cause serious implications for their welfare (Swist, T. Collin, & MC Cormack, 2015). In this regard, about 175000 children aged 0-16 years have received support services in cases of child abuse and threats by the Internet during 2019- 2020 (AIHW, 2021). Swist, Collin, & MC Cormack, (2015) stated some examples of known opportunities, threats, and rights of Australian kids online:

Opportunities

- Providing new opportunities and game spaces for kids and adolescents online
- Creating opportunities through online video games for learning, creativity, identity formation, socialization and stress relief to increase children's welfare
- Creating opportunities to use social networks for strengthening youth media literacy and establishing foundations for their welfare
- Creating public opportunity to teach online at the school level
- Creating new opportunities for participation, self-expression and creativity in social categories
- Facilitating, promoting and increasing interpersonal, family, local and global communications
- Creating opportunities for sending and receiving messages via the Internet
- Creating opportunities to manage personal files on the Internet
- Creating opportunities to design and build a variety of media games
- Receiving consulting services from experts to fulfill optimal activities in cyberspace

Threats

- Promoting negative concepts and categories which potentially lead to harmful actions.

- Distributing of the images of kids illegally by criminals
- Promoting and expanding the eating disorders or self-harm (Boyd, 2010, cited in Swist et al., 2015)
- Promoting deaths related to normative suicides and agreed suicide
- Wasting of time and the emergence of Internet addiction
- Sending annoying death messages which can be suicidal warning signs (headspace, 2012)
- Cyber-bullying and engaging in abnormal behaviors

Rights of Australian kids online

- a. Raising the awareness of parents and teachers about the rights of kids online
- b. Teaching children and adolescents different kinds of digital literacy which includes the media, the Internet and socio-emotional literacy.
- c. Teaching Internet skills to teachers and school principals
- d. Helping the creation and expansion of formal and informal learning networks which provide different channels for children and adolescents via social media and mobile technology.
- e. Considering cultural and linguistic criteria in designing and compiling the programs which provide the welfare of online users.
- f. Conducting ongoing studies on the effects of cyberspace in the geographical, social, cultural, political, emotional and psychological areas to create new policies for providing desirable services to online users
- g. Increasing the awareness of policy makers, parents, teachers, and researchers about the growing changes in social life and the need for cyberspace to deal with such changes
- h. Teaching and guiding kids and adolescents online to make the best use of cyberspace and practice resilience while facing the resulting threats
- i. Considering the rights of kids online and creating some opportunities for their requests and voices to be heard

4.1.2. South Africa

South Africa has a population of 59 million people with different races (80% African and 20% mixed of Asian, Indian and European). After the apartheid regime and the onset of democracy in 1994, some efforts were made to unite the black majority and create an equal society. Nevertheless, society has remained as an unequal whole with the blacks still suffering from the pressures of such inequalities. This country has 38 million Internet users (Global Internet Statistics, 2021). South Africa conducted a pilot study of global kids online in three provinces of East Cape Town, West Cape Town, and Guateng in 2016. The nature of the Internet use and its effect on children's rights is less understood in South Africa as a country in the South of the world than in the rest of the world. Preliminary efforts have been made during the recent years to protect children's rights such as participation and the use of Internet opportunities, as well as consideration of their freedom of expression and privacy. Nevertheless, kids online are exposed to threats such as verbal violence, violent images, family fights due to opposition to the Internet, harassing behaviors (face to face or

online) with strangers, different kinds of sexual contact, sexual images, and depiction of naked people. In this regard, both parents and children have reported that the Internet use has often been harmful so that children avoided doing their homework and caused less sleep at night. However, many parents were unaware of their children's connection to cyberspace. South Africa is known as a country of high violence due to its high suicide rate (32.8 per 100,000 during 2014-2015) and many women and children are victims of violence in this country (Phyfer, Burton, & Leoschut, 2016). The excessive use of the Internet for more than ten hours a day has reduced users' sleep at night and less hours of study (Salubi et al, 2019). Phyfer, Burton, & Leoschut, (2016) provided some examples of the opportunities, threats and rights of kids online in South Africa as follows:

Opportunities

- Opportunity to play and have fun on the Internet
- Opportunity to establish social interactions via cyberspace
- Opportunities to set up private profiles
- Opportunities through online video games to learn
- Ability to send and receive instant messages via email
- Ability to manage a set of Internet accounts to socialize
- Ability to use different social networking websites
- Use of cyberspace for learning and educational activities at some schools

Threats

- The presence of hateful speech and violent images online
- Existence of annoying face to face or online behaviors
- Fight between the child with the family due to their opposition to the Internet use
- Online contact with strangers and display of naked people
- Reception of unwanted sexual images and messages
- Cyberbullying, criminal behaviors and threatening messages
- Negligence of children by parents and the lack of any guidance and support on behalf of parents
- Insufficient internet access at schools
- The lack of teachers' role for guiding students in online activities
- Problems in understanding online content in children's first language
- The lack of access to the public due to the cost of data and its tools
- Rise of suicide rates among kids online

Rights of South African kids online

- a. Developing a legal framework on the role of parents in protecting the rights of kids online
- b. Formulating standard indicators for children's access to the Internet
- c. Creating infrastructure facilities for cheap internet access

- d. Increasing public awareness about the importance of the rights of kids online and their access to content and messages which contribute to their health and welfare.
- e. Avoiding excessive reports about the negative effects of the Internet which can prevent parents from the access of their children to the Internet.
- f. Finding ways for children to access the Internet at schools.
- g. Increasing the awareness of teachers and providing infrastructure for using the Internet in teaching and learning.
- h. Teaching technical skills to children and guiding them towards the optimal use of cyberspace

4.1.3. Brazil

Brazil is a country in South America with a population of 212.5 million with a variety of races and ethnicities and is considered as a developing country. Accordingly, in any discussion of children and their relationship with mobile media and other tools, attention should be paid to its vast space, socio-economic and cultural diversity. While there are still big challenges in this country in dealing with digital segmentation, Brazilian children participate in a growing trend in a saturated media environment which highlights their use of mobile tools (Sozio, et al., 2015). Differences between socioeconomic classes in Brazil have a significant effect on the access and use of Internet tools and the development of children's digital skills. Less common use of laptops and tablets among Brazilian children is because of lower scores and the use of mobile network packages as an alternative to Wi-Fi connections in their use of the Internet (Hasebrink, et al., 2009). Beyond the category of inequalities in access to the digital world, the issue of opportunities and threats related to the use of the Internet by children is highly significant. An online children's ICT survey in Brazil indicated that access to and connection to the Internet enables people to acquire different activities, interactions, entertainment, and knowledge.

According to the main findings of the 2013 survey, one in three Brazilian children has access to mobile internet, and the digital gap through the connection of mobile devices to the internet is much smaller compared to the socio-economic gap in home internet access. A significant increase in mobile access means facing virtual opportunities and threats, and causes a bigger challenge for parents and legal educators in Internet intervention (Helsper et al., 2013 cited by Sozio et al., 2015). Thus, parental intervention has always been an essential factor in relation to the use of the Internet by children. Parental control, with more or less restrictions, exists in different countries regarding the position and creativity of children in using the Internet. Based on a survey conducted by the Brazilian Online Children's ICT Survey (Sozio, et al., 2015), young users engage in a variety of

activities such as entertainment and information retrieval and Internet interactions, the most common of which is visiting social network websites. More than half of 11- 15-year old children (52%) use the Internet for this purpose. However, only 5% use the Internet to perform school work. Based on the analyses, the majority of Internet users (77%) are from the upper social class and lower social class children use the Internet less (Sozio, et al., 2015). It is worth noting that Brazilian children have less access to the Internet at school. The low speed of the Internet in public schools and restrictions on the use of the Internet is one of the effective factors in this case. As a result, the Internet is used by young Brazilians mostly outside the home, involving the houses of relatives and friends, cyber-cafes, libraries and call centers. Sozio, et al., (2015) showed some examples of opportunities, threats, and how to address the rights of kids online in this country as follows:

Opportunities

- Using the Internet to perform some educational activities at school
- Visiting social network websites
- Searching for information to satisfy curiosity
- Watching a variety of video clips
- Playing computer games with other people
- Managing and controlling personal files on the Internet
- Downloading a variety of music or movies
- Sending and receiving instant messages
- Watching TV programs and movies in cyberspace

Threats

- Receiving unwanted texts and images in cyberspace
- Spending too much time in cyberspace and Internet addiction (Dalamaria et al., 2020)
- Having unwanted calls through anonymous people
- Providing personal information available through others
- Providing personal photos available to others without prior consent
- Facing problematic and harmful moral messages
- Being exposed to cyber threats and harassment
- Facing cyber-bullying
- Receiving sex pictures and videos

Rights of Brazilian kids online

- a. Listening to the experiences of kids online through the words they use
- b. Making children ware of not to provide personal information and photos to others without prior consent

- c. Reporting and informing children to their parents and legal guardians in case of cyberbullying
- d. Informing parents to share the experiences of their kinds online
- e. Providing practical suggestions to children to curb cyberbullying
- f. Upgrading the training of trainers for effective coordination with changes in the digital world
- g. Providing media literacy training at school as a necessity
- h. Providing public government services in addressing the opportunities and threats in the use of the Internet by children
- i. Providing discussions about children's rights in Internet interactions
- j. Considering children's rights to remove content which harms the reputation and integrity of their personality.

4.1.4. Iran

In Iran, the increasing attention and acceptance of children and adolescents to the use of the Internet in different fields such as entertainment, information, business, interpersonal and educational relationships, etc. has affected different aspects of their lives. Based on 2020 statistics, the mobile internet download speed in Iran is at the 70th rank and its fixed internet speed is at the 122nd rank in the world (Student News Agency, 2020). Due to the expansion of the Internet penetration rate, discussions gradually arose on different aspects of the Internet, and how to use the goals and motivations of Internet users. The extent of considering some social groups such as religious, cultural, and political groups as a problematic issue and its growth depend on the observance of the limits determined in line with the values and norms of society. Such an approach to the Internet may be related to the fact that this medium provides a wide range of information to individuals without any restrictions. In this regard, the Internet user in Iran has become out of its natural and functional form and has suffered from a type of dysfunction (Ganji et al., 2018).

The problem of Internet speed and bandwidth is in a condition where most countries have passed (ADSL) and the cost of Internet connection is another barrier to the use of cyberspace for online users in Iran. About 20 million Internet users are people under the age of 18 , who are highly vulnerable to cyber-bullying and need support(IRNA,2018). Iran accepted membership in the Convention on the Rights of the Child in 1993, provided that its provisions are in conflict with domestic law and Islamic standards or are not required by the Government of the Islamic Republic of Iran (Islamic Consultative Assembly,1993). The Ministry of Guidance and the Digital Media Center, the FATA Police, and the Information Technology Organization have launched promotional measures to protect the rights of cyberspace users since the 2000s. The Computer Crimes Law and the document on the protection of children's rights in cyberspace were passed in 2009 and 2017,

respectively. With the advent of the Coronavirus and the increasing use of cyberspace by students this document has been revised (Student News Agency, Abolghasemi,2020), However no serious steps have been taken so far to implement these resolutions to ensure the rights of kids online. Some examples of cyberspace opportunities and threats and how to address the rights of kids in Iran are as follows:

Opportunities

- Creating and managing personal online environment in cyberspace
- Choosing new friends in cyberspace
- Using leisure and various entertainment (Ameli & Mohseni Ahoui, 2018)
- Using scientific, educational and educational use of kids online by cyberspace
- Creating the ability in personal control and strengthening the individual will of the user, which causes freedom of action and personal control as one of the main reasons for the tendency of people, especially the youth to social networks (Rokanabadi, 2016)
- Gaining and exchanging new information with others (Maleki, 2016)
- Gaining general and health information (Rouhani & Tari, 2009)
- Transferring content and communication messages and promoting media literacy (Ameli & Mohseni Ahoui, 2018)

Threats

- Having less connection with family and peer group in case of excessive use of the Internet
- Receiving sexual content and images
- Academic decline and reduced educational performance among online users (Emami Rizi, 2016)
- Inviting to run away from home and commit suicide
- Abusing user's private information
- Facing annoying situations, types of fraud and cyber bullying (Zare et al., 2020)
- Spreading and transferring immoral and threatening content (Rokanabadi, 2016)
- Facilitating illegal activities and the growth of cybercrime using new online methods
- Creating an incompatible pattern in excessive use of the Internet or Internet addiction (Poornaqdi, 2018)

Rights of Iranian kids online

- a. Approving the child protection document in cyberspace
- b. Designing and presenting a curriculum for teaching media literacy in schools (Mohebzadeh, 2020)
- c. Training computer skills for some teachers to effectively coordinate with changes in the digital world
- d. Providing education using cyberspace at smart schools

- e. Using news and information media to train parents about the opportunities and threats of cyberspace
- f. Policy-making and predicting macro-strategies in upstream documents to consider the rights of kids online and the optimal use of cyberspace in schools (Fundamental Transformation Document of the Education System (2011) and National Curriculum Document (2011))

4.2. Comparison

4.2.1. Similarities and differences in opportunities

Table 1. Comparing the similarities and differences of the selected countries in opportunities

Factors	Australia	South Africa	Brazil	Iran
Game, fun and entertainment (filling leisure time)	*	*	*	*
Opportunity to learn and do homework	*		*	*
Creativity, innovation and self-expression	*			
Achieving media literacy	*			*
Learning resilience in the face of threats	*			
Social participation with others	*	*	*	*
Sending and finding instant messages	*	*	*	*
Ability to manage personal media files	*	*	*	*
Public opportunity to teach and learn online at school	*			
Opportunity for creativity and self-expression	*			
Receiving counseling services to reduce stress when using the Internet	*			
Promoting interpersonal, family, local and global communication	*			

As shown in Table 1, the items such as fun games to fill leisure time, learning and doing homework at home, socializing with others, sending and receiving, instant messages and the ability to manage personal media accounts are available to kids online in the four studied countries. However, the opportunity to achieve media literacy is only available to users in Australia and Iran. The other opportunities such as the public opportunity to teach online learning in school, creativity and self-expression, receiving counseling services to reduce stress while using the Internet, learning of resilience in kids online in the face of threats and the opportunity of improving local family interpersonal communication and the world belongs exclusively to Australian kids online. The comparison of the studied countries showed that Australia had the highest opportunities for the optimal use of the Internet to kids online.

4.2.2. Similarities, differences and threats

Table 2. Comparing the similarities and differences of the selected countries in threats

Factors	Australia	South Africa	Brazil	Iran
Promoting violence and abusive behavior	*	*	*	*
Cyber-bullying, criminal behavior and violation of children's rights	*	*	*	*
Waste of time in cyberspace and academic failure	*	*	*	*
Being exposed to hate speech and sexual and immoral scenes	*	*	*	*
Facilitating lawlessness and the growth of cybercrime	*	*	*	*
Unwanted receipt of personal information by strangers		*	*	*
Parents' opposition to kids online		*		
Calling strangers and inviting them for have sex calls		*		
Inviting to commit suicide	*	*	*	*
Lack of supportive intervention by parents and educators among kids online		*	*	*
Internet addiction in online users	*	*	*	*

As shown, kids online in the four studied countries face the threats such as promoting violence and abusive behavior, cyber-bullying, criminal behavior and child abuse, waste of time and academic failure, exposure to education, sexual and immoral scenes, illegal acts and the growth of cybercrime, as well as inviting suicide and Internet addiction. Kids online in South Africa, Brazil and Iran face other threats such as unwanted receipt of personal information by strangers and the lack of support from parents and educators. Parents' opposition to children using the Internet, calling strangers and inviting to sexual contact are among the special problems of children among the kids online in South Africa.

4.2.3. Similarities and differences in considering children's rights

Table 3. Comparing the similarities and differences of the selected countries considering children's rights

Factors	Australia	South Africa	Brazil	Iran
Planning to teach media literacy to children and adolescents	*		*	*
Conducting comprehensive research on the positive and negative effects of cyberspace	*			
Policy-making and action to provide desirable services to online users	*			
Requiring education and awareness of parents to share the experiences of kids online	*	*	*	
Requirement to teach and guide children in resilience training in cyber threats	*	*	*	
Designing examples of cyberspace-based curricula at schools	*	*	*	*
Preventing excessive reports about the negative effects of the Internet which prevents parents from providing the Internet for children.		*		
The necessity to provide cheap and accessible Internet for children and adolescents	*			
Legal ways for dealing with cybercrime	*		*	*
Commitment to the International Convention on the Rights of the Child (CRC)	*	*	*	*
Necessity of computer skills training for teachers	*	*	*	*
Developing a legal framework for parents the protect the rights of kids online	*	*		
Hearing the rights, requests and voices of kids online	*			

Comparing the data on how to consider the rights of kids online in the studied countries indicated that the commitment to comply with the International Convention on the Rights of the Child (CRC), planning to teach media literacy to children and adolescents, designing examples of school curricula and a requirement for computer training for teachers are common in all studied countries. Media literacy education is planned for children and adolescents and there are legal ways for dealing with cybercrime in three countries of Australia, Brazil and Iran. The requirement of teaching and informing parents to share the experiences of kids online is only considered in

Australia and Brazil. Developing a legal framework for parents to protect the rights of kids online is unique to Australia and South Africa. As can be observed, Australia, as a developed country, could take greater steps towards the welfare and rights of kids online than other studied countries. Conducting ongoing studies on the positive and negative effects of cyberspace on kids online, policy-making and action to provide desirable Internet services to users, and emphasizing the hearing of the rights and voice of kids online are the examples of this country's comprehensive commitment to observe the rights of kids online.

5. Conclusion

This study compared the opportunities and threats of the Internet and considering the rights of kids online in four countries of Australia, South Africa, Brazil and Iran. The findings revealed that kids online in the four studied countries was different in terms of how Internet access. In this case, Australia attempted to provide Internet access to all children and adolescents including schools. In South Africa, parents considered the Internet to be more harmful and children often access the Internet without their parents' knowledge. In addition, teachers' pay little attention to the use of the Internet at schools. In Brazil, most kids online only have internet access through tools such as mobile. This problem is mostly because of the deep digital gap in the Internet use and the diversity of social and economic context in this country. Due to the problems related to limited Internet speed and bandwidth in Iran, as well as the digital gap caused by socio-economic conditions and lack of public Internet access, especially in public schools, most children and adolescents still no access to cheap, high-speed Internet. This problem is somehow evident during the Coronavirus era and the need for virtual education.

Regarding the opportunities provided by the Internet for children online, the findings indicated that most children and adolescents had access opportunities such as the ability to manage personal media accounts, fill their free time with games and entertainment, send and receive messages, learn and do homework and socialize with others in the studied countries. At the same time, there were differences in the amount and quality of opportunities created for kids online in the studied countries. For example, Australian online users had access to higher opportunities such as media literacy training and the use of the Internet in schools, the opportunity to receive counseling services to reduce anxiety and increase resilience when using the Internet, creativity and legal ways for addressing the cybercrimes. Due to the lack of Internet access in South Africa and parental opposition, as well as the lack of attention from school principals, there are fewer

opportunities for optimal use of cyberspace for kids and adolescents online. Because of low Internet speed and the lack of access to the Internet at school in Brazil, most children can use cyberspace services at their relatives' homes or by visiting Internet cafes and mobile phones. Such problems make the opportunities to the use of the Internet more limited to more computer games and chatting with friends, although Iranian kids and adolescents have access to cyberspace through laptops, tablets, and especially mobile phones. Due to socio-economic conditions, poor infrastructure, limited speed and less access to the Internet in schools, Iranian kids and adolescents have fewer opportunities to make the best use of the Internet. Despite such limitations, Iranian kids online can use cyberspace to learn more, do some homework, play games and entertainment, gain general and health information, and interact with others. The results are consistent with those of some other studies (Forghani & Mohajeri, 2018; Livingstone et al., 2011; Maleki, 2016; Mohebzadeh, 2020; Roknabadi, 2016; Schuster et al., 2020).

Regarding the threats posed by cyberspace to children and adolescents, the findings of this study indicated that factors such as Internet addiction, cyber-bullying, promotion of violence and harassing behaviors, exposure to criminal behavior, being exposed to irrelevant words and sexual and immoral images threatens to invite children to commit suicide, waste of time and dropping out of school threaten the kids online in the studied countries. In all of the studied countries, Internet addiction confronts children and adolescents with a variety of issues such as poor public health, malnutrition, obesity, sleep disorders and mental health problems such as withdrawal, anxiety and depression. Another problem is that such people gradually lose the opportunity to gain many social experiences due to lack of face-to-face communication with others. Such an issue gradually damages their cultural and social identity and can cause complications such as obesity, sleep disorders and depression. Such findings are consistent with those of some studies (Cardeflet-Winsler, 2017; Cass & Griffith, 2012; Dadras, 2019; D Worak et al., 2007; Emami Rizi, 2016; Helspr et al., 2013; Kraut et al., 1998; Pournaghdi, 2018; Rouhani & Tari, 2011; Sampasa-Kanyinga, & Hamilton, 2015; Sayadi et al., 2014; Sheikhlari & Sadeghpour, 2019; Torkel, 2012)

Cyber-bullying is another serious threat which children and adolescents often face online. Cyber-bullying involves commercial exploitation, extortion, threats and intimidation, and exposure to obscene language which affects the personal and social security of users. Cyber-bullying as a threat can cause a variety of psychological and social harms such as lying, aggression, violence, lack of concentration, anxiety and weakness in social control in individuals. The findings related to cyber-

bullying are consistent with the findings of some other studies (e.g. Kardeflt-Winther, 2017; Sampasa-Kanyinga, & Hamilton, 2015; Sampasa-Kanyinga et al, 2018; World Health Organization, 2013, 2014; Zare, Alimoradi & Rahmanian, 2020; Zezyc, 2014).

Considering the rights of kids online is a global issue which affects the cultural, social, economic and political contexts of each country. Based on the Convention on the Rights of the Child, different countries have attempted to reduce the destructive effects of cyberspace while creating an appropriate opportunity for children and adolescents. Educating kids online, informing parents, teachers and school principals to accompany, cooperate and support children in cyberspace, and enacting laws and regulations to protect the rights of kids online are some of the required actions for governments. The findings of this study indicated that the four studied countries have accepted membership in the Convention on the Rights of the Child, but differ in its obligation and commitment. There are many differences in how countries consider the rights and welfare of kids online in the studied countries. In Australia, policies to provide desirable online services to online users and easy and cheap Internet access are highly considered. Furthermore, establishing the necessary laws to protect the rights of kids online, educating parents to share the experiences of kids online, educating and guiding kids and adolescents in resilience training while facing cyber threats, and emphasizing the hearing of the rights and voices of kids online are regarded. South Africa has attempted to prevent possible reports of the negative effects of the Internet, which could prevent parents from the access of their children to the Internet and take initial steps to pursue the provisions of the Convention on the Rights of the Child online. Australia has the highest level of attention to the welfare and rights of children online compared to the three countries of South Africa, Brazil and Iran. Given the current barriers with the advent of coronary heart disease, all schools, teachers, students and their parents have been required to apply the Internet and cyberspace to teach learning, implement each of such approvals and instructions to adopt appropriate legal, executive, social, cultural and educational measures to increase opportunities and reduce cyber threats and efforts to protect the rights and well-being of Iranian kids online are becoming increasingly significant and necessary. Findings of this part of the study are in line with the findings of some other studies (Mohebzadeh, 2020; Phyfer, Burton, & Leoschut, 2016; Sozio et al., 2015; Supreme Council of the Cultural Revolution, 2011; Swist, Collin, & MC Cormack, 2015). Based on the findings of this study, the following suggestions can be made for policy makers, stakeholders and cyberspace planners for taking the necessary legal, executive, and educational measures to create the rights of Iranian kids online in the framework of international cooperation:

- ❖ Conducting studies to investigate the positive and negative effects of cyberspace and identify methods for ensuring the rights and welfare of kids online in the country
- ❖ Providing the necessary infrastructure to present high-speed, cheap and accessible Internet for all kids and adolescents online
- ❖ Preparing the facilities and equipment required for e-learning and learning in schools
- ❖ Protecting the rights of kids online in accordance with the Convention on the Rights of the Child, with emphasis on the dignity of Iranian and Islamic culture and values
- ❖ Informing and aligning cyberspace policymakers with educators, parents, principals, teachers and school counselors to determine and apply their supportive role for the rights of kids online
- ❖ Having legal actions against those who commit criminal cyber acts against kids and adolescents online.
- ❖ Classifying the content and services appropriate to the age and gender of kids online and the development of secure environments protected in cyberspace
- ❖ Teaching and guiding children in the practice of resilience and self-control while faced with cyber threats
- ❖ Training parents, teachers and administrators to fully support the rights and welfare of kids online
- ❖ Creating a free space for comments and listening to the voices of kids online
- ❖ Designing forums to discuss the experiences of parents to monitor and support the rights and well-being of kids online
- ❖ Informing parents to support and share the experiences of kids online
- ❖ Planning to implement the provisions of the Convention on the Rights of the Child and upstream documents, particularly the document on the fundamental transformation of the country's education to pay more attention to the rights and welfare of kids online

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